

Department of Energy

ROCKY FLATS OFFICE P.O. BOX 928 GOLDEN, COLORADO 80402-0928

FEB 2 8 1990

90-DOE-5068

Mr. David C. Shelton, Director Hazardous Material & Waste Management Division Colorado Department of Health 4210 East 11th Avenue Denver, Colorado 80220

Dear Mr. Shelton:

This letter is in response to your concern over contaminated surface waters in South Walnut and Woman Creeks. Your concerns were expressed in your comments on the draft Phase II RI/FS Workplan (alluvial) for Operable Unit 2 (OU2), dated February 14, 1990.

We were surprised by your comments that the volatile organic compound (VOC) release to South Walnut and Woman Creeks was not identified in the Interim Measures/Interim Remedial Action (IM/IRA) Plan and that actions were not presented by our staff that address these releases. These VOC releases are presented on page 2-65 of the IM/IRA Plan where it is further noted that these VOCs have never been detected in surface water at stations farther downstream within the property boundary. On this basis, the IM/IRA Plan did not address measures for this contaminant migration pathway. You have previously called this to our attention, and we have discussed this with your staff on the phone and in meetings. The results of our discussions, we conclude, led to your statement in your January 26, 1990, letter where you stated "all parties agreed that the draft proposed [IM/IRA] Plan is based on insufficient information to adequately design an effective IM/IRA for OU2." Given this situation, we have agreed to develop a phased RI approach that will allow expedited collection of data for preparation and implementation of an IM/IRA plan in advance of completion of the final RI Report. This was discussed with your staff in a meeting held February 23, 1990.

Furthermore, in the meeting and tour of OU2 conducted February 27, 1990, we agreed to revisit an IM/IRA for VOC discharges to surface water. In our next meeting, scheduled for March 7, 1990, we will discuss IM/IRA approaches for surface water contamination.

On another matter, the enclosure describes changes to the Interagency Agreement (IAG) schedule and milestones contained within the Federal Facility Agreement and Consent Order Milestone Schedule (IAG Table 6) and the IAG Baseline Schedule, dated January 8, 1990. These changes will be incorporated into the Environmental Restoration IAG Baseline Schedule.

If you or your staff have any questions, please feel free to call me or have your staff contact Scott R. Grace of my staff at (303) 966-7199.

Sincerely

Robert M. Nelson, Jr.

Manager

Enclosure

cc w/Enclosure:

T. T. Olsen, DOE, RFO

M. Hestmark, EPA

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cc w/o Enclosure:

T. Greengard, EG&G

M. Arndt, EG&G

L. Johnson, EPA

N. Miullo, EPA

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IDENTICAL LETTER SENT TO:

Mr. Robert C. Duprey, Director

Waste Management Division

U.S. Environmental Protection Agency-Region VIII

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